UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TEYO JOHNSON,

                Plaintiff,

     v.

EVERYREALM INC., COMPOUND ASSET
MANAGEMENT LLC, REALM METAVERSE
REAL ESTATE INC., REPUBLIC, REPUBLIC
CRYPTO LLC, REPUBLIC REALM MANAGER
LLC, REPUBLIC REALM INC., REPUBLIC
OPERATIONS LLC, OPENDEAL INC.,
OPENDEAL PORTAL LLC, JANINE YORIO, in
her individual and professional capacities, and JULIA
SCHWARTZ, in her individual and professional
capacities.

                Defendants.

Index No. 1:22-cv-06669(PAE)(GWG)

DECLARATION OF
SHANE SEPPINNI

I, SHANE SEPPINNI, pursuant to 28 U.S.C. § 1746 affirm as follows:

1.   I submit this Declaration in support of Mr. Johnson's Opposition to Defendants'

Motion to Compel Arbitration.

2.   On September 1, 2022, Defendants informed me that they filed an arbitration

demand with the American Arbitration Association. A true and correct copy of Defendants'

Amended Statement of Claim is attached as Exhibit A. Non-parties names are redacted.

3.   On Wednesday, August 3, 2022, Defendants' investigator, Xan Raskin, called me

and asked if Mr. Johnson would sit for a two-hour interview. I informed Ms. Raskin that Mr.

Johnson would only sit for questioning by Defendants during a deposition. Ms. Raskin informed

me that our conversation was and would remain confidential. Ms. Raskin also informed me that

Everyrealm's Board of Directors, of which defendants Ms. Yorio and Ms. Schwartz are members, hired her.

4.   On July 27, 2022, I transmitted a letter to Defendant's counsel informing Defendants of Mr. Johnson's good-faith belief that he was not bound by an arbitration agreement for these claims. A true and correct copy of this letter is attached as Exhibit B.

5.   On August 12, 2022, I transmitted a letter to Defendant's counsel requesting, among other things, that Defendant's inform me if they intend to waive service of process and if they have complied with Plaintiff's document preservation demand. Defendants have not responded to this letter. A true and correct copy is attached as Exhibit C.

Dated: September 9, 2022   _____*/s/ Shane Seppinni*_____